

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

- - - - - x

UNITED STATES OF AMERICA

: INDICTMENT

-v.-

RONDEL BRANDON,
a/k/a "Brandon Rondel,"

Defendant.

- - - - - x

COUNT ONE

The Grand Jury charges:

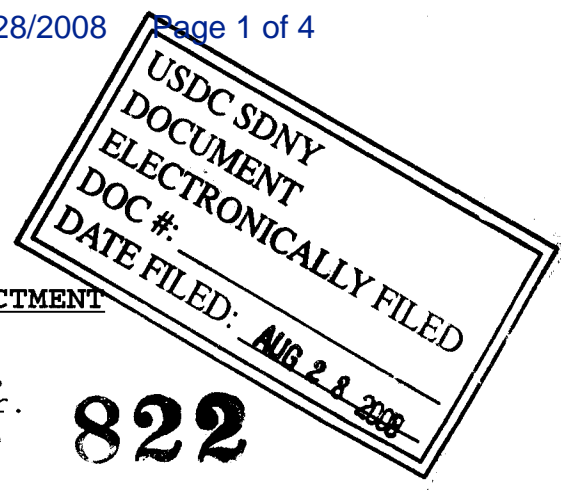
1. From in or about December 2007, through in or about February 2008, in the Southern District of New York and elsewhere, RONDEL BRANDON, a/k/a "Brandon Rondel," the defendant, unlawfully, willfully, and knowingly, and with intent to defraud, as part of an offense affecting interstate commerce, did effect and attempt to effect transactions, with one and more access devices issued to another person and persons, to receive payment and other things of value during a 1-year period, the aggregate value of which exceeded \$1,000, to wit, BRANDON purchased goods using other people's credit card accounts, without authorization from the account holders.

(Title 18, United States Code, Sections 1029(a)(5) and
1029(b)(1).)

COUNT TWO

The Grand Jury further charges:

2. From in or about December 2007, through in or



08 CRIM 822

about February 2008, in the Southern District of New York and elsewhere, RONDEL BRANDON, a/k/a "Brandon Rondel," the defendant, unlawfully, willfully, and knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Section 1028A(c), to wit, BRANDON possessed and used the name and other personal identification information of other individuals to commit access device fraud as charged in Count One.

(Title 18, United States Code, Sections 1028A and 2.)

FORFEITURE ALLEGATION

3. As the result of committing the offense alleged in Count One herein, RONDEL BRANDON, a/k/a "Brandon Rondel," the defendant, shall forfeit to the United States, pursuant to 18 U.S.C. §982(a)(2)(B), any property constituting, or derived from, proceeds obtained directly or indirectly as a result of such violations, including but not limited to a sum in United States currency representing the amount of proceeds obtained as a result of the offense alleged in Count One.

Substitute Asset Provision

4. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

(1) cannot be located upon the exercise of due diligence;

(2) has been transferred or sold to, or deposited with,
a third person;

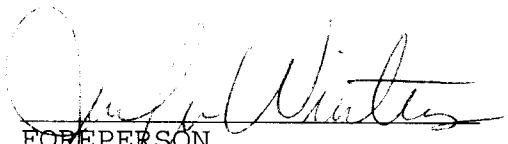
(3) has been placed beyond the jurisdiction of the
Court;


(4) has been substantially diminished in value; or

(5) has been commingled with other property which
cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to 18 U.S.C.
§ 982(b), to seek forfeiture of any other property of said
defendant up to the value of the above-described forfeitable
property.

(Title 18, United States Code, Sections 982 and 1029.)


FOREPERSON


MICHAEL J. GARCIA
United States Attorney

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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a/k/a "Brandon Rondel,"

Defendant.

INDICTMENT

08 Cr.

(18 U.S.C. §§ 1029(a)(5),
1029(b)(1), 1028A)

MICHAEL J. GARCIA
United States Attorney.

A TRUE BILL


Foreperson.

Indictment. Case assigned to Judge Kaplan.
Agreed for defendant.

- Francis, J.